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8 Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 MARINA SARKISYAN,

16 Defendant.

No. CR 18-00288 (A) -SVW

STIPULATION TO CONTINUE SENTENCING

17
18 Plaintiff United States of America, by and through its counsel
19 of record, the United States Attorney for the Central District of
20 California and Assistant United States Attorney Valerie L.
21 Makarewicz, and defendant Marina Sarkisyan ("defendant"), by and
22 through her counsel of record, Craig Missakian, Esq., hereby
23 stipulate as follows:

24 1. On May 17, 2018, the original indictment was filed against
25 the defendant in this case, which charges the defendant with
26 conspiracy to commit health care fraud, in violation of Title 18,
27 United States Code, Section 1349, and health care fraud, in violation
28 of Title 18, United States Code, Section 1347. A First Superseding

1 Indictment was subsequently returned against defendant on June 18,
2 2019, which contains the same charges against defendant.

3 2. On November 23, 2020, the defendant's executed plea
4 agreement was filed with the Court. In the plea agreement, the
5 defendant agreed to plead guilty to Count One of the First
6 Superseding Indictment, conspiracy to commit health care fraud, in
7 violation of Title 18, United States Code, Section 1349.

8 3. On March 3, 2021, the Court held a change of plea hearing
9 during which time the defendant pleaded guilty to Count One of the
10 First Superseding Indictment. The Court scheduled a sentencing
11 hearing for the defendant for June 30, 2021, at 11:00 a.m. After
12 several continuances, the sentencing hearing was scheduled for
13 November 8, 2021. The Court continued the sentencing to February 28,
14 2022.

15 4. By this stipulation, the parties move to continue the
16 defendant's sentencing hearing from February 28, 2022, to August 1,
17 2022, at 11:00 a.m. The parties request this continuance based upon
18 the following facts, which the parties believe demonstrate good cause
19 to continue the defendant's sentencing hearing. Due to the COVID-19
20 pandemic, defendant has not been able to prepare fully for
21 sentencing. Defendant requests additional time to prepare for
22 sentencing, meet with counsel to prepare her position re: sentencing,
23 and prepare letters of support to present to the Court for
24 consideration.

25 5. The case against the main defendant, Roshanak Khadem, was
26 recently resolved in its entirety upon the court's acceptance of
27 guilty pleas from Ms. Khadem. Ms. Khadem is scheduled to be
28 sentenced on June 27, 2022.

1 6. Therefore, the parties herein agree that defendant should
2 be sentenced after Ms. Khadem.

3 7. Based on the foregoing facts, the parties request that the
4 Court continue the sentencing hearing for the defendant from February
5 28, 2022, to August 1, 2022 at 11:00 a.m.

6 IT IS SO STIPULATED.

7 Dated: 2/23/22

TRACY L. WILKISON
United States Attorney

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9 SCOTT M. GARRINGER
Assistant United States Attorney
Chief, Criminal Division

10
11 /s/ Valerie L. Makarewicz
12 VALERIE L. MAKAREWICZ
Assistant United States Attorney

13 Attorney for Plaintiff
14 UNITED STATES OF AMERICA

15
16 Dated: 2/23/22

17 /s/ Craig Missakian (with permission)
18 CRAIG MISSAKIAN, ESQ.
Attorney for Defendant MARINA SARKISYAN